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October 26, 2006

Linda Cole, Chief
Long-Term Care Policy and Planning
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, MD 21215

Re: Proposed Changes to COMAR 10.24.08 and Draft Update of the State Health Plan for Facilities and Services: Nursing Home, Home Health Agency, and Hospice Services

Dear Ms. Cole:

Montgomery Hospice appreciates the invitation to comment informally on the Proposed State Health Plan. As an interested party, Montgomery Hospice wishes to state that it endorses the content of the letter submitted by the Hospice Network of Maryland's attorney, Jack C. Tranter.

Montgomery Hospice, in addition, wishes to reinforce the opinion that Section .13c should be eliminated. Permitting CCRC's to start hospices without first obtaining a CON will undermine the CON law. Circumventing the CON law for this population of older and insured residents will disrupt the hospice market and weaken hospice providers.

Maryland public policy, instead, should promote financially stable hospices that do not have to adjust to a disrupted market. Since larger hospices are more financially viable than smaller ones, public policy should work to make the existing hospices stronger, thereby providing greater access to quality hospice services. Circumventing CON by adding specialty hospices will do the reverse. It will reduce the size of hospices, making them all weaker.

Sincerely,

Ann Mitchell MPH
President & CEO
Montgomery Hospice